POLICY REVIEW AND
COMPLIANCE REVIEW MEMORANDUM

To:	Christie E. Kelley, Executive Director
From:	Gina A. Levesque, Intake and Compliance Manager
Date:	March 22, 2022
Re:	A19-009 – City of West Palm Beach Ethics Policy Review and Training Compliance (Employees/Elected Officials)

- **Background**

The Code of Ethics (Code) states in part under Section 2-446(a) that the county or municipal administrator shall establish by policy a mandatory training schedule for all employees, which shall include mandatory periodic follow-up sessions. Section 2-446(b) states in part that the COE shall develop and deliver training programs and ensure that the training is delivered in a timely manner.

- **Objectives and Scope**

    The objectives are:
    o To provide assurance that the agency has a training policy.
    o To provide assurance that the training policy includes enough specific information to employees that they can determine clear parameters, including initial training with deadline and grace period defined, and retraining cycle timeline with deadlines and grace periods defined.
    o To provide reasonable assurance the agency is requiring its employees to comply with the training policy.

The scope of this review focused on the policy and acknowledgement forms for employees and elected officials within the City of West Palm Beach (City). A separate review will be conducted for City appointed officials. The delivery method of the ethics training and internal tracking method of compliance were not part of the scope.

Based on Personnel Policy 4-22 with an effective date of July 16, 2018, employees must receive initial Code of Ethics training within 30 days of employment. Elected officials must receive initial training within 30 days of taking office.   After initial training, all City employees and elected officials must complete follow-up training every two years by September 30.

- **Approach and Methodology**

On October 19, 2019, I sent an email to Mike Russell in Human Resources requesting a list of current employees and officials including their hire dates and proof of training. On October 25, 2019, I received a spreadsheet from Mr. Russell with the information requested for employees and elected officials. However, the information for appointed officials was not included. Therefore, I sent another email to Mr. Russell asking for contact information for the individual who maintained the information for appointed officials, but I did not receive a reply. Although Mr. Russell forwarded all the information necessary to complete a compliance review regarding the employees and elected officials, I did not complete a report at that time and failed to follow-up with him or anyone at the City for additional information. The COE reported performing 9 compliance reviews in 2019 in the Annual Report, but this report had not been completed even though the information was provided. Therefore, I am issuing a report based on the information provided at that time.

- **Findings**

The training policy for the City was revised in 2018 and remained the guiding policy. The policy required the completion of training for new hires within 30 days of employment, and for elected officials within 30 days of taking office. All employees and elected officials are subsequently required to complete ethics retraining every 2 years by September 30.

At the time of the review, the City consisted of 1700 employees and 5 elected officials, and all of the employees and elected officials were trained or retrained within the guidelines stated in their ethics training policy.

- **Recommendations**

Due to this report being completed over two years after the review, there are no recommendations being made for the City regarding the training policy.
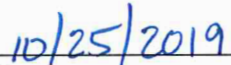
- **Conclusions**

The results of the review found that the employees and elected officials for the City of West Palm Beach were in compliance with their policy.

Submitted by:

Gina A. Levesque (signature)

Gina A. Levesque, Intake and Compliance Manager
Palm Beach County Commission on Ethics

10/25/2019
Nunc pro tunc to Date

Reviewed by:

CK

(Initials)

3-22-22
Date